



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CMM  
F. #2015R02148

*610 Federal Plaza  
Central Islip, New York 11722*

April 6, 2020

By ECF

The Honorable Joan M. Azrack  
United States District Judge  
United States District Court  
Eastern District of New York  
924 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Edward Mangano, et. ano.  
Criminal Docket No. 16-540 (S-2) (JMA)

Dear Judge Azrack:

The government submits this letter to respectfully request a 45-day extension of time to respond to the defense motions in the above-referenced matter, requesting a new trial and reconsideration of a previously decided motion. In light of the ongoing health crisis, the delays attendant to transitioning to telework, and the need to respond to various emergency applications in other matters, the government requests additional time to fully and meaningfully brief its opposition to the defendant's motions. This is the government's second request for an extension. Defense counsel Kevin Keating, Esq. and John Carman, Esq. have no objection to this request.

In light of the above, the government respectfully requests that the motion schedule be adjusted as follows: (1) the government's opposition to the defendant's post-trial motions to be filed on or before May 22, 2020; and (2) the defendant's reply briefs, if any, to be filed on or before June 5, 2020.

